

BRUCE A. BLAKEMAN
County Executive



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COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY

August 8, 2024

Via ECF

Honorable Brian M. Cogan
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kahlon v. County of Nassau, et al.
Docket No. 24-CV-02439 (BMC)

Your Honor:

This office represents defendant County of Nassau (the “County”) in the above-referenced matter. The purpose of this letter is to provide a status report regarding the County’s efforts to obtain discovery materials in order to serve its Rule 26(a)(1) Initial Disclosure Statement as well as the County’s First Set of Document Requests and Interrogatories.

As Your Honor may recall, this case arises from plaintiff Yossef Kahlon’s (“Plaintiff”) arrest by the Nassau County Police Department in June 2021 on charges of sexual assault upon Defendant-Counterclaimant Celine Boulben. After a jury trial commenced in March 2023 resulted in plaintiff being acquitted of all charges, Plaintiff commenced the instant action in Supreme Court, Nassau County against the County, John and Jane Doe members of the Nassau County District Attorney’s Office, Defendant-Counterclaimant Boulben and John and Jane Doe “Me-Too” organizations. Ms. Boulben’s attorneys filed an Answer, Affirmative Defenses and Counterclaims on April 1, 2024 [DE 1] and removed the action to federal court.

On April 8, 2024 the Court entered a Civil Case Management Plan [DE 11] under which the parties were to serve Initial Disclosures by June 6, 2024, and then serve their First Set of Document Requests and Interrogatories by July 12, 2024.

In order to obtain case files and documents from the Nassau County Police Department and the Nassau County District Attorney’s Office, since Plaintiff was acquitted at trial, these records were kept under seal. I therefore had to obtain a Stipulation to Unseal Record from Plaintiff’s and Ms. Boulben’s attorneys, and also Authorizations to Unseal Records from both Plaintiff and Ms. Boulben. Yesterday, I received the executed documents from the attorneys for Plaintiff and Ms. Boulben and immediately forwarded them to the Police Department and the District Attorney. I received a message today from both agencies that due to the large number of documents involved, I will not receive the documents until the end of next week at the earliest. When I do receive the documents, I will be able to serve the County’s Initial Disclosures, and then draft and serve the County’s First Set of Document Requests and Interrogatories.

I thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: (via ECF)
All counsel of record